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VIA ECF

October 26, 2015

Hon. Magistrate Judge Ronald L. Ellis  
States District Court Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Galland v. Johnston 14-CV-4411

Honorable Judge Ellis:

This is in response to Plaintiff's letter to the Court and Order to Show Cause filed October 15 and 19<sup>th</sup> respectfully. Plaintiff states that they had made several attempts to get their witness "interrogated", however, Defendant Johnstons have not requested the deposition of his witness to date. The letter to the court was the first I have seen of any discovery demands. Neither the Johnstons, nor I, have been served with any discovery requests. We also have never received Plaintiff's Rule 26 initial disclosures. Defendants Johnstons further object to any informal demand Plaintiffs have made through their letter to the court, as they do not comply with FRCP 30, 34, or any local rules of this Court. In addition, Defendant Johnstons object to Plaintiff's demands numbered 1-9 in that they are not relevant to the subject matter in this case, nor would they reasonably lead to the discovery of admissible evidence. Furthermore, Plaintiffs' requests are overbroad, unduly burdensome, and may contain documents protected by attorney/client privilege or work product doctrine.

As such, we request that the Order to Show Cause be Denied in its entirety.

Thank you for your consideration in this matter.

Very truly yours,

Lisa R. Porter, Esq.  
JP Law, PC.

Cc: Joseph Donat, Esq. (by ECF); Claude Galland 166 West 75th Street, Suite 1208 New York, NY 10023; Violaine Galland 166 West 75th Street, Suite 1208 New York, NY 10023, ParisStudios West 75th Street, Suite 1214 New York, NY 10023

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